

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRIAN FLORES, STEVE WILKS and RAY
HORTON, as Class Representatives, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

THE NATIONAL FOOTBALL LEAGUE; NEW
YORK FOOTBALL GIANTS, INC. d/b/a NEW
YORK GIANTS; MIAMI DOLPHINS, LTD. d/b/a
MIAMI DOLPHINS; DENVER BRONCOS
FOOTBALL CLUB d/b/a DENVER BRONCOS;
HOUSTON NFL HOLDINGS, L.P. d/b/a
HOUSTON TEXANS; ARIZONA CARDINALS
FOOTBALL CLUB LLC d/b/a ARIZONA
CARDINALS; TENNESSEE TITANS
ENTERTAINMENT, INC. d/b/a TENNESSEE
TITANS and JOHN DOE TEAMS 1 through 26,

Defendants.

Civil Action No.: 22-cv-00871 (VEC)

**DECLARATION OF DOLORES F. DIBELLA IN FURTHER SUPPORT OF
DEFENDANTS' MOTION TO COMPEL ARBITRATION AND STAY FURTHER
PROCEEDINGS**

I, Dolores F. DiBella, declare and state as follows:

1. I am the Senior Vice President of Legal Affairs for defendant the National Football League (the "NFL"). I respectfully submit this declaration in further support of Defendants' motion to compel arbitration and stay further proceedings (the "Motion").

2. Attached as Exhibit 1 to this declaration is a true and correct copy of the Constitution and Bylaws of the NFL, revised as of September 14, 2016. This document was also attached as Exhibit 1 to the prior declaration I submitted on June 21, 2022 in support of Defendants' Motion (Dkt. 49 & 50), and is attached here again for completeness.

3. Attached as Exhibit 2 is a true and correct copy of an employment agreement between plaintiff Brian Flores and defendant Miami Dolphins, Ltd., dated February 4, 2019.

4. Attached as Exhibit 3 is a true and correct copy of an employment agreement between plaintiff Brian Flores and New England Patriots LLC, dated February 1, 2016.

5. Attached as Exhibit 4 is a true and correct copy of an employment agreement between plaintiff Brian Flores and Pittsburgh Steelers LLC, dated February 18, 2022.

6. Attached as Exhibit 5 is a true and correct copy of an employment agreement between plaintiff Steve Wilks and defendant Arizona Cardinals Football Club LLC, dated January 22, 2018.

7. Attached as Exhibit 6 is a true and correct copy of an employment agreement between plaintiff Steve Wilks and Panthers Football, LLC, dated February 16, 2022.

8. Attached as Exhibit 7 is a true and correct copy of an employment agreement between plaintiff Ray Horton and defendant Tennessee Football, Inc., dated January 20, 2014.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 3, 2023 in Los Angeles, California.


Dolores F. DiBella